



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

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November 21, 2003

Sent via e-mail, hand-delivery, and/or U.S. Mail

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: UNE Triennial Review Regarding Switching, Transport, Loops, and Batch
Hot Cuts for Mass Market Customers, D.T.E. 03-60

Dear Secretary Cottrell:

Enclosed for filing please find the Attorney General's Second Set of Document and Information Requests to Verizon, AG-VZ-2-1 to 2-25, together with a Certificate of Service.

Sincerely,

Karlen J. Reed
Assistant Attorney General
Utilities Division
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Boston, MA 02114
(617) 727-2200 ext. 3436

KJR/kr
Enc.

cc: Paula Foley, Hearing Officer/AGC (w/enc.).
D.T.E. 03-60 Service List (w/enc.)

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Proceeding by the Department of Telecommunications and Energy on its)	
own Motion to Implement the Requirements of the Federal)	
Communications Commission's Triennial Review Order Regarding)	D.T.E. 03-60
Switching for Mass Market Customers.)	
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**ATTORNEY GENERAL'S
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS
TO VERIZON MASSACHUSETTS**

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon New England d/b/a Verizon Massachusetts ("Verizon MA" or "Company") or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of

the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.
13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.

15. Provide two copies of each response to the Attorney General.
16. Unless the Request specifically provides otherwise, the term "Company" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses to requests within seven business days from receipt of these questions per the Hearing Officer's Ground Rules dated October 17, 2003.

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Switching for Mass Market Customers.

referenced on page 53 of the Hot Cut Testimony. Please provide a narrative explaining the rationale for each step.

- AG-VZ-2-8** Please provide a detailed description of all instances where Service Cost personnel “applied an even more aggressive FLAF to account for likely improvements which would result from other factors” as noted on Page 54, lines 20-22 of the Hot Cut Testimony. Please also provide the rationale as well as the calculations for each instance.
- AG-VZ-2-9** Please provide the complete analysis of variance results for the regression discussed on pages 55-56 of the Hot Cut Testimony.
- AG-VZ-2-10** Please provide all validations performed on the survey process estimates using WFA-DI, noted on page 56, lines 16-17 of the Hot Cut Testimony.
- AG-VZ-2-11** Please refer to page 57 of the Hot Cut Testimony. Please explain the Company’s rationale for using engineers to estimate transfers at the SAI rather than the technicians or the technicians’ supervisors, as was done with work time estimates and occurrence estimates.
- AG-VZ-2-12** Who performed the estimate of how often a spare copper or UDLC facility would exist as discussed on page 57, lines 7-9 of the Hot Cut Testimony?
- AG-VZ-2-13** Has Verizon performed any estimates of labor rate changes as a function of early retirement incentives? Please provide all studies that have been performed. If no actual studies have been undertaken, is it Verizon’s position that the rates, as calculated using the process described on pages 57-59 of the Hot Cut Testimony, will not change?
- AG-VZ-2-14** How were the hiring plans discussed in the scalability analysis, page 66 of the Hot Cut Testimony, factored into the labor rates? Were vacation overheads adjusted for the new hires? If so, how?
- AG-VZ-2-15** Was the training discussed in the scalability analysis used to calculate the training factor discussed on page 69, line 8 of the Hot Cut Testimony?
- AG-VZ-2-16** Will training for the batch hot cut process be centralized for multiple states, or will training personnel be sent to remote locations?
- AG-VZ-2-17** Does the WPTS system discussed on page 21 of the Hot Cut Testimony process Verizon-MA hot cuts only, or does it process other states’ hot cuts as well? If WPTS serves multiple states, please identify the states and provide the volumes appropriate to the increased load on the system.

- AG-VZ-2-18** Does Verizon-MA have a dedicated electronic ordering system to handle Verizon-MA hot cuts (dedicated hardware and software)? If the answer is no, please provide the total Verizon data that would correspond to the Verizon-MA data provided in the scalability testimony.
- AG-VZ-2-19** Has Dr. Taylor performed his analysis for other Verizon entities? Has a total impact on Verizon systems been determined? Please provide the summarized data at the level that matches the system that will be processing it.
- AG-VZ-2-20** Are the work centers mentioned in the scalability analysis dedicated to Verizon-MA orders? For any work centers serving multiple states, please provide estimates of the total change in load that will be experienced by the center.
- AG-VZ-2-21** What percentage of Verizon's management force subscribed to the recent retirement offer? Please provide both Verizon-MA and total Verizon wireline data.
- AG-VZ-2-22** What impact will the recent retirements have on overhead? Have any studies or estimates been undertaken to quantify the impacts? Please provide all such data.
- AG-VZ-2-23** What is the basis for the 2.5 year forecasted life discussed on page 64, line 6 of the Hot Cut Testimony? Please provide all studies and backup supporting this factor.
- AG-VZ-2-24** Which of the Massachusetts Carrier-to-Carrier Guidelines and performance metrics will apply to the Company's proposed batch hot cut process?
- AG-VZ-2-25** What remedies will consumers have if their service is interrupted while subject to the Company's proposed batch hot cut process?

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I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding by either hand delivery, mail, and/or e-mail.

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